

1 THE HONORABLE BENJAMIN H. SETTLE
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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

VENA L. WARD, an individual,)
Plaintiff,) No. 15-cv-05477-BHS
v.)
RAY MABUS, Secretary, Dept. of the Navy,)
Defendant.)

)

I. **STIPULATED MOTION**

COMES NOW Plaintiff VENA WARD (“Plaintiff”) and Defendant Ray Mabus, Secretary of the Navy, (“Defendant”) (Plaintiff and Defendant collectively are referred to as the “Parties”), by and through their counsel of record, and respectfully move this Court for entry of the subjoined Order Extending Certain Pretrial Deadlines. In support of this Motion, the Parties state as follows:

1. This action involves Plaintiff’s employment claims against Defendant for violation of Title VII of the Civil Rights Act of 1964. The Parties have been engaged in active written discovery since January 2016.

STIPULATED MOTION TO EXTEND CERTAIN
PRETRIAL DEADLINES - 1
NO. 15-CV-05477-BHS

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2. The Parties have been working to resolve differences regarding the critical responses to the discovery. In particular, there are a number of issues concerning potential identification, redaction, and production of information that may be classified or otherwise protected by law. This information includes e-mails as well as other documents and correspondence. The parties cannot move forward with key depositions until the issues pertaining to this information have been resolved.

3. The Parties telephonically conferred in good faith on March 16, 2016 and have agreed that certain pretrial deadlines should be modified to allow for sufficient time to address the discovery issues referenced above and complete all necessary depositions.

4. As a result of the foregoing, the Parties request that this Court enter an order extending the following pre-trial dates in the current schedule:

- a. Expert Witness Disclosure/Reports under FRCP 26(a)(2) due by July 1, 2016;
- b. Rebuttal Expert Disclosure/Reports due by August 1, 2016;
- c. All motions related to discovery due by August 15, 2016;
- d. Discovery shall be completed by August 22, 2016;
- e. Dispositive motions to be filed by September 1, 2016; and
- f. Motions in limine shall be filed by October 6, 2016;
- g. All other dates remain as set forth in the Court's November 5, 2015

Minute Order Setting Trial and Pretrial Dates, Dkt. No. 9.

5. The Parties agree that no pretrial deadlines that have already expired should be revived for purposes of this requested extension.

1 6. The Parties believe in good faith that this will permit them to complete all
2 discovery and meaningfully explore the possibility of settlement of the claims raised in the
3 Complaint.

4 7. The Parties bring this Motion in good faith and without intent to cause undue
5 delay, prejudice, or expense on any other party or this Court.

6 8. The Parties have not previously sought an extension of time to engage in
7 discovery.

8 WHEREFORE, Plaintiff Vena Ward and Defendant Ray Mabus, Secretary of the Navy,
9 respectfully request that this Court enter the Order Modifying Pretrial Deadlines.

10 Dated this 22 day of April, 2016.

11 By: s/ Jacob M. Downs

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II. ORDER

It is so ordered.

Dated this 25th day of April, 2016.


BENJAMIN H. SETTLE
United States District Judge

**STIPULATED MOTION TO EXTEND CERTAIN
PRETRIAL DEADLINES - 4
NO. 15-CV-05477-BHS**

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